

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

SHANNAN WHEELER, et al., )  
Plaintiffs, ) CIVIL ACTION  
v. ) Case No.: 4:17-cv-2960  
ARKEMA INC., )  
Defendants. )  
)

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**PLAINTIFFS' MOTION TO EXCLUDE OPINIONS CONTAINED IN THE EXPERT REPORT OF GARY PAPKE AND THOMAS HAMILTON NOT PREPARED BY THEM**

Pursuant to Rule 702 of the Federal Rule of Evidence and *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) and for the reasons set forth in Plaintiffs' Memorandum of Law in Support of this Motion, Plaintiffs respectfully request that the Court enter an order excluding certain expert testimony relating to opinions contained in the expert report of Gary Papke and Thomas Hamilton which were not prepared by either of them.

**DATED: November 22, 2021**

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2021, I served a true and correct copy of the foregoing *Plaintiffs' Motion to Exclude Opinions Contained in the Expert Report of Gary Papke and Thomas Hamilton Not Prepared by Them* upon all known counsel of record by email and the Court's ECF electronic filing service in compliance with Federal Rule of Civil Procedure 5 and Local Rule 5.1:

Respectfully submitted by  
ATTORNEYS FOR PLAINTIFFS:

**STAG LIUZZA, LLC**

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